

Robert J. Lack  
Ricardo Solano Jr.  
FRIEDMAN KAPLAN SEILER  
& ADELMAN LLP  
One Gateway Center, 25th Floor  
Newark, NJ 07102-5311  
(973) 877-6400  
*Attorneys for Defendant LoanCare, LLC*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

---

FREEDOM MORTGAGE  
CORPORATION,

Plaintiff,

v.

LOANCARE, LLC (as successor to FNF  
Servicing, Inc. and LoanCare, a Division of  
FNF Servicing, Inc.),

Defendant.

---

:  
:  
: No. 1:16-cv-02569-RMB-KMW  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE***

TO: Jerry A. Cuomo, Esq.  
Landman Corsi Ballaine & Ford P.C.  
One Gateway Center, 4th Fl.  
Newark, NJ 07102  
(973) 623-2700

PLEASE TAKE NOTICE that on July 5, 2016, or as soon thereafter as  
counsel may be heard, the undersigned attorneys for defendant LoanCare, LLC shall  
move this Court, pursuant to Local Civil Rule 101.1(c), for an Order permitting the  
appearance *pro hac vice* of Stuart H. Singer, William T. Dzurilla, and Pascual A. Oliu in  
this matter.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, the defendant shall rely upon the declarations of Stuart H. Singer, William T. Dzurilla, Pascual A. Olius, and Ricardo Solano Jr., submitted herewith. Local Civil Rule 101.1(c)(1) provides that an attorney who is a member in good standing of the bar of any court of the United States or of the highest court of any state may be admitted *pro hac vice* in the discretion of the Court. The qualifications of Stuart H. Singer, William T. Dzurilla, and Pascual A. Olius are adequately described in the accompanying declarations. Plaintiff, through counsel, has consented to the *pro hac vice* admission of Stuart H. Singer, William T. Dzurilla, and Pascual A. Olius in this matter. Accordingly, it is respectfully submitted that no brief is necessary.

PLEASE TAKE NOTICE that no oral argument is requested.

Dated: Newark, New Jersey  
June 9, 2016

Respectfully submitted,

s/ Ricardo Solano Jr.  
Robert J. Lack  
Ricardo Solano Jr.  
FRIEDMAN KAPLAN SEILER  
& ADELMAN LLP  
One Gateway Center, 25th Floor  
Newark, NJ 07102-5311  
(973) 877-6400  
Email: rlack@fklaw.com  
rsolano@fklaw.com

*Attorneys for Defendant LoanCare, LLC*